

Lance Pope

From: Lance Pope
Sent: Wednesday, April 13, 2022 7:59 PM
To: Walton, David
Cc: Jean Neveling; Jeremy Cothorn; Uppal, Pavneet; Grisham, Greg
Subject: RE: Activity in Case 1:22-cv-00050-TRM-SKL Ecolab, Inc. et al v. Ridley et al Stipulation

Dave –

I will give you a call tomorrow around 11:00 to discuss. Thanks.

LWP



Lance W. Pope

Attorney

Patrick, Beard, Schulman & Jacoway, P.C.

Phone: (423) 756-7117

Fax: (423) 267-5032

Email: lpope@pbsjlaw.com

537 Market Street, Suite 300
Chattanooga, Tennessee 37402
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From: Walton, David <dwalton@fisherphillips.com>
Sent: Wednesday, April 13, 2022 12:29 PM
To: Lance Pope <lpope@pbsjlaw.com>
Cc: Jean Neveling <jneveling@pbsjlaw.com>; Jeremy Cothorn <jcothorn@pbsjlaw.com>; Uppal, Pavneet <puppall@fisherphillips.com>; Grisham, Greg <ggrisham@fisherphillips.com>
Subject: RE: Activity in Case 1:22-cv-00050-TRM-SKL Ecolab, Inc. et al v. Ridley et al Stipulation

Hey Lance –

I just left you a VM. Please let us know where we stand with the stipulated injunction. We need to reach an agreement on a stip or we will have to file for a preliminary injunction.

Please let us know either way.

Thank you.

Dave



David Walton

Partner

Fisher Phillips

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From: Walton, David

Sent: Friday, April 8, 2022 4:32 PM

To: Lance Pope <lpope@pbsjlaw.com>

Cc: Jean Neveling <jneveling@pbsjlaw.com>; Jeremy Cothorn <jcothorn@pbsjlaw.com>; Uppal, Pavneet <puppall@fisherphillips.com>; Grisham, Greg <ggrisham@fisherphillips.com>

Subject: Re: Activity in Case 1:22-cv-00050-TRM-SKL Ecolab, Inc. et al v. Ridley et al Stipulation

No, we cannot do that.

Sent from my iPad

On Apr 8, 2022, at 4:27 PM, Lance Pope <lpope@pbsjlaw.com> wrote:

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Dave - Thank you for your follow up email. If Ridley agreed to these conditions in a stipulated injunction, would Ecolab be willing to leave him out of its amended complaint?

Thank you.

LWP

Lance W. Pope

Patrick, Beard, Schulman and Jacoway P.C.

423-756-7117

From: Walton, David <dwalton@fisherphillips.com>

Sent: Friday, April 8, 2022 1:15:04 PM

To: Lance Pope <lpope@pbsjlaw.com>

Cc: Jean Neveling <jneveling@pbsjlaw.com>; Jeremy Cothorn <jcothorn@pbsjlaw.com>; Uppal, Pavneet <puppall@fisherphillips.com>; Grisham, Greg <ggrisham@fisherphillips.com>

Subject: RE: Activity in Case 1:22-cv-00050-TRM-SKL Ecolab, Inc. et al v. Ridley et al Stipulation

Lance –

If your client would be willing to enter into a stipulated injunction (see below for terms), we would be willing to split the cost of imaging the phone and the computer.

Our proposed terms for the stipulated injunction include:

- Ridley turns over for forensic analysis his wife's computer, his phone, and all devices/accounts that touched any Nalco/Ecolab data;
- Ridley will identify (under oath) all devices/accounts that at any point were within his possession, custody or control and have touched any Nalco/Ecolab data;
- Ridley will certify under oath that he does not have possession, custody or control of any Nalco/Ecolab information and if he finds some in the future, he needs to contact you and we need to work together to remediate the particular situation;
- Ridley and Nalco/Ecolab (via counsel) will negotiate a protocol for the forensic review and analysis of all devices/accounts that Ridley's identifies per bullet no. 2 above;
- This forensic review and analysis will include, at minimum, searching for Nalco/Ecolab data, identifying USB activity, and exploring deletion/wiping activity; and
- Ridley will sit for a "mini" deposition that will not count towards the seven hours that we otherwise have to depose him in the future (and Ridley will make himself available for a second deposition later in discovery).

We reserve all rights to add additional terms to the list above.

Please let us know what you think.

Dave



David Walton

Partner

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This message may contain confidential and privileged information. If it has been sent to you in error, please reply to advise the sender of the error, then immediately delete this message.

From: Walton, David
Sent: Wednesday, April 6, 2022 12:58 PM
To: Lance Pope <lpope@pbsjlaw.com>
Cc: Jean Neveling <jneveling@pbsjlaw.com>; Jeremy Cothorn <jcothorn@pbsjlaw.com>; Uppal, Pavneet <puppall@fisherphillips.com>; Grisham, Greg <ggrisham@fisherphillips.com>
Subject: RE: Activity in Case 1:22-cv-00050-TRM-SKL Ecolab, Inc. et al v. Ridley et al Stipulation

Hey Lance –

Just tried your number below but it was busy (haven't heard a busy signal in a long time). Feel free to call my cell @ 215.527.8459.

Look forward to speaking with you.

Dave



David Walton

Partner

Fisher Phillips
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From: Lance Pope <lpope@pbsjlaw.com>
Sent: Wednesday, April 6, 2022 10:14 AM
To: Walton, David <dwalton@fisherphillips.com>
Cc: Jean Neveling <jneveling@pbsjlaw.com>; Jeremy Cothorn <jcothorn@pbsjlaw.com>; Uppal, Pavneet <puppall@fisherphillips.com>; Grisham, Greg <ggrisham@fisherphillips.com>
Subject: RE: Activity in Case 1:22-cv-00050-TRM-SKL Ecolab, Inc. et al v. Ridley et al Stipulation

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Dave –

I have an update on the information below. Do you have time today for a quick call to discuss next steps? Thanks.

LWP



Lance W. Pope

Attorney

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From: Lance Pope

Sent: Friday, April 1, 2022 7:49 AM

To: Walton, David <dwalton@fisherphillips.com>

Cc: Jean Neveling <jneveling@pbsjlaw.com>; Jeremy Cothorn <jcothorn@pbsjlaw.com>; Uppal, Pavneet <puppall@fisherphillips.com>; Grisham, Greg <ggrisham@fisherphillips.com>

Subject: RE: Activity in Case 1:22-cv-00050-TRM-SKL Ecolab, Inc. et al v. Ridley et al Stipulation

David –

Thanks for your message. I am sure we can work out some form of an agreed preliminary injunction. I understand that Ridley's external hard drive has been shipped to my office and I expect to receive the digital image of that drive as well as a download of his Hotmail account early next week.

I will review that material, discuss your request regarding Ridley's phones and LinkedIn account, and work on getting a digital image of his wife's laptop's hard drive. I will be back in touch by next Wednesday with an update on those items.

Thanks,

LWP



Lance W. Pope

Attorney

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From: Walton, David <dwalton@fisherphillips.com>
Sent: Thursday, March 31, 2022 11:44 AM
To: Lance Pope <lpope@pbsjlaw.com>
Cc: Jean Neveling <jneveling@pbsjlaw.com>; Jeremy Cothorn <jcothorn@pbsjlaw.com>; Uppal, Pavneet <puppall@fisherphillips.com>; Grisham, Greg <ggrisham@fisherphillips.com>
Subject: RE: Activity in Case 1:22-cv-00050-TRM-SKL Ecolab, Inc. et al v. Ridley et al Stipulation

Lance —

Thank you for this information. Please let us know if you are planning to have the relevant phone(s) imaged as well as the LinkedIn account. We will also be seeking his cell phone logs, so please preserve them as well.

In lieu of a preliminary injunction, let us know if you would agree to stipulated injunction that would include a forensic analysis of Mr. Ridley's personal external hard drive, his Hotmail account, his wife's computer, his LinkedIn account, relevant mobile phone(s), and any other electronic device(s), email account(s), cloud-based account(s), or something similar that has been used to store, copy, transfer, or otherwise access any Nalco/Ecolab data.

I know you are out-of-the-office and I apologize, but we need a quick response from your client.

Best,

Dave



David Walton

Partner

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From: Lance Pope <lpope@pbsjlaw.com>
Sent: Tuesday, March 29, 2022 8:15 AM
To: Walton, David <dwalton@fisherphillips.com>
Cc: Jean Neveling <jneveling@pbsjlaw.com>; Jeremy Cothorn <jcothorn@pbsjlaw.com>; Uppal, Pavneet <puppall@fisherphillips.com>; Grisham, Greg <ggrisham@fisherphillips.com>
Subject: RE: Activity in Case 1:22-cv-00050-TRM-SKL Ecolab, Inc. et al v. Ridley et al Stipulation

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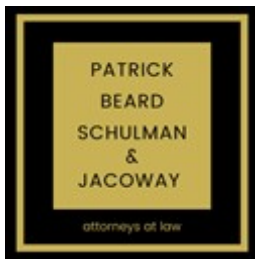
Good Morning, David —

To address your questions below:

- Hotmail is preserved. I am waiting on the download from Ryan's IT provider. I believe it should be mailed out today.
- Personal external hard drive has also been preserved as I understand. I should receive it in the next few days.
- Not sure about LinkedIn account.
- I am not aware of any phone images.
- As I understand, the only other computer to which Anthony had access (other than his EL laptop and CT laptop) belongs to his wife. We are working with an IT provider in Nashville to arrange for an image of that laptop's hard drive. I'll let you know when we have that lined up.

Thanks,

LWP



Lance W. Pope

Attorney

Patrick, Beard, Schulman & Jacoway, P.C.

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From: Walton, David <dwalton@fisherphillips.com>

Sent: Monday, March 28, 2022 4:44 PM

To: Lance Pope <lpope@pbsjlaw.com>

Cc: Jean Neveling <jneveling@pbsjlaw.com>; Jeremy Cothorn <jcothorn@pbsjlaw.com>; Uppal, Pavneet <puppal@fisherphillips.com>; Grisham, Greg <ggrisham@fisherphillips.com>

Subject: RE: Activity in Case 1:22-cv-00050-TRM-SKL Ecolab, Inc. et al v. Ridley et al Stipulation

Lance –

Hope you are well.

Please confirm that Mr. Ridley has preserved the following:

- Hotmail account (full copy; I think Ryan Holt got an image of this)
- Personal external hard drive (I think Ryan Holt secured a copy)
- Copy of all LinkedIn messages and his full account
- Images of any smartphones he had used since May 1, 2022, including all text messages
- All computers he had potential access to since May 1, 2022

Also, did Mr. Ridley have a personal computer at some point since June 1, 2022?

Thank you.

Dave



David Walton

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From: Walton, David

Sent: Friday, March 25, 2022 2:17 PM

To: Lance Pope <lpope@pbsjlaw.com>

Cc: Jean Neveling <jneveling@pbsjlaw.com>; Jeremy Cothorn <jcothorn@pbsjlaw.com>; Uppal, Pavneet <puppall@fisherphillips.com>; Grisham, Greg <ggrisham@fisherphillips.com>

Subject: RE: Activity in Case 1:22-cv-00050-TRM-SKL Ecolab, Inc. et al v. Ridley et al Stipulation

Lance –

Good talking with you. Stip looks good.

Dave



David Walton

Partner

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From: Lance Pope <lpope@pbsjlaw.com>

Sent: Friday, March 25, 2022 2:11 PM

To: Walton, David <dwalton@fisherphillips.com>

Cc: Jean Neveling <jneveling@pbsjlaw.com>; Jeremy Cothorn <jcothorn@pbsjlaw.com>

Subject: RE: Activity in Case 1:22-cv-00050-TRM-SKL Ecolab, Inc. et al v. Ridley et al Stipulation

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Thanks Dave. Good speaking with you just now. We just filed the notice of substitution of counsel, and I expect that the clerk will add us to the ECF notifications once the Court approves the substitution. I have attached the stipulation extending Ridley's time to respond to the complaint until April 15, 2022. Please let me know if I have the Plaintiffs' permission to e-sign and file with the Court once the Court substitutes our firm as Ridley's attorneys of record.

LWP



Lance W. Pope

Attorney

Patrick, Beard, Schulman & Jacoway, P.C.

Phone: (423) 756-7117

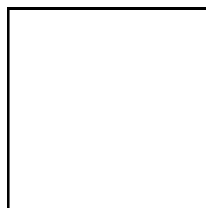
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From: Walton, David <dwalton@fisherphillips.com>
Sent: Friday, March 25, 2022 1:07 PM
To: Lance Pope <lpope@pbsjlaw.com>
Subject: FW: Activity in Case 1:22-cv-00050-TRM-SKL Ecolab, Inc. et al v. Ridley et al Stipulation



David Walton

Partner

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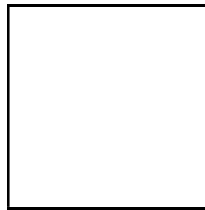
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From: Grisham, Greg
Sent: Friday, March 25, 2022 11:31 AM

To: Walton, David <dwalton@fisherphillips.com>; Uppal, Pavneet <puppal@fisherphillips.com>;
Honeycutt, Mike <lhoneycutt@fisherphillips.com>; Crainer, Brandon <bcrainer@fisherphillips.com>
Cc: Vegas, Lori <lvegas@fisherphillips.com>
Subject: FW: Activity in Case 1:22-cv-00050-TRM-SKL Ecolab, Inc. et al v. Ridley et al Stipulation

fyi



J Gregory Grisham

Attorney At Law

Fisher & Phillips LLP

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From: tned_cm-ecf@tned.uscourts.gov <tned_cm-ecf@tned.uscourts.gov>
Sent: Friday, March 25, 2022 10:26 AM
To: tned_Courtmail@tned.uscourts.gov
Subject: Activity in Case 1:22-cv-00050-TRM-SKL Ecolab, Inc. et al v. Ridley et al Stipulation

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U.S. District Court - Eastern District of Tennessee

Notice of Electronic Filing

The following transaction was entered by Sims, W. Scott on 3/25/2022 at 11:25 AM EDT and filed on 3/25/2022

Case Name: Ecolab, Inc. et al v. Ridley et al

Case Number: [1:22-cv-00050-TRM-SKL](#)

Filer: Chemtreat Inc

Document Number: [14](#)

Docket Text:

STIPULATION re [1] Complaint, *Extending Time to Respond* by Chemtreat Inc. (Sims, W. Scott)

1:22-cv-00050-TRM-SKL Notice has been electronically mailed to:

Christina Lopez clopez@srvhlaw.com

J. Gregory Grisham ggrisham@fisherphillips.com, lvegas@fisherphillips.com,
mreed@fisherphillips.com

Michael R O'Neill moneill@simsfunk.com, gfarmer@simsfunk.com, jbaum@simsfunk.com

Ryan T Holt RHolt@sherrardroe.com, lbates@srvhlaw.com, sbeishuizen@srvhlaw.com

W. Scott Sims ssims@simsfunk.com, gfarmer@simsfunk.com, jbaum@simsfunk.com,
moneill@simsfunk.com

1:22-cv-00050-TRM-SKL Notice has been delivered by other means to:

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1062680380 [Date=3/25/2022] [FileNumber=4753891-0
] [07ada28be60692041a3ff07c5f3a049d8aff23c5ab63393b88f4e527e550ff869d2
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